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October 23, 2018

RE: 18-NOI-01, Notice of Inquiry Regarding Electric Vehicles

Emily Brumit; Ritta Merza; Katharine McErlean; and Jennifer Morris
Illinois Commerce Commission
160 North LaSalle, Ste. C- 800 Chicago, IL 60601

EVgo appreciates the opportunity to provide written comments on the Notice of Inquiry (NOI) issued by the Illinois Commerce Commission (ICC) on September 24, 2018. EVgo operates America's largest public EV fast charging network, with over 1050 chargers in 66 metropolitan markets, representing where 90% of new EVs are currently sold. Using primarily DC fast chargers (DCFCs), EVgo powers EV drivers for more miles than any public charging network in the nation. We provide over 100,000 monthly charges to 100,000+ EV drivers, powering EVs to drive more than 5,000,000 miles each month.

Currently, EVgo has deployed 26 fast charging stations in Illinois, and we welcome the opportunity for further collaboration. EVgo brings a unique perspective via a first learner advantage in having built more public fast charging in the U.S. than any other company. Below are EVgo's comments with respect to key questions within the September 24th, 2018 NOI as they relate to electric vehicle service equipment (EVSE).

1. **Utilities play a key role in EV infrastructure deployments.**

   From our experience installing more public fast charging stations across the country than any other company, we will note that utilities have been, and are, a critical partner in the EV charging space. Utilities are a key stakeholder when it comes to EV charging. Not only do they need to provide the interconnection for fast chargers and be part of the siting conversation as we move to higher and higher power levels, but many utilities themselves are seeking approval from their regulators to invest directly in EV charging infrastructure.

   EVgo has long believed that a rising tide lifts all boats. That is why we have been supportive of all sorts of investments in electric vehicle charging infrastructure, in addition to the nine figures we have deployed to date. We will continue to invest and grow EVgo's nation-leading public fast charging network, but utilities and other charging companies can and will invest in public charging infrastructure. The key for regulators and other policymakers is to recognize how utility investment can complement and encourage private competition.

   One area where there is consensus on utility investment is in the "make-ready" infrastructure. Utilities investing in the conduit and other electrical infrastructure leading up to the charger is a win-win. The utility gets to focus on its core competency, enable more demand for them to serve, reduce capital costs for third party charging companies, and increase private investment. At times, a utility may undercut other market participants by proposing public charging pricing that is too far below market for private enterprises to complete, for example. Another challenge could be the utility investing in areas already served by the private market, such as rideshare and dense urban cores. Such approaches may threaten the viability of individual businesses with thin margins. Utilities should work in partnership with experienced EV charging partners to deliver the infrastructure EV consumers need in a driver-centric manner.

   Successful deployments of EV infrastructure happen when utilities and charging companies plan together early and often, especially in capacity analysis. This means that the ICC should ensure that utilities are staffed accordingly so that they have the means to respond quickly to requests for power availability, for example. A designated team working to streamline charger interconnections is crucial. The electric vehicle market is poised to soar, and utilities must be staffed accordingly to prepare for a surge in requests.

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2. **Both DC fast chargers and slow chargers should be deployed, and the technology deployed at a given location should depend highly on use case.**

Charging stations should consist of chargers that are appropriate with respect to the geographic placement of any given station. Slow chargers (Level 2) can be appropriate for individual residences and workplaces where EV drivers will ostensibly park their vehicle to charge for several hours.

DC fast charging, on the other hand, is more appropriate for short 20, 30, 45, or even 60 minute charges, and fast charging stations are therefore frequently sited in locations where the charging experience can be integrated into an EV driver's daily life, such as a retail center where customers can charge while they shop. It is also important to site DC fast chargers in high density locations with a high concentration of multi unit-dwellings so that renters and those without a dedicated parking spot may access a public charger.

As the ICC examines use cases for DC fast chargers, one example can be taken from CalEVIP, an incentive program run by the California Energy Commission. CalEVIP considers restaurants, retail centers, airport cell phone lots, parking garages, gas stations, colleges/universities, city or government owned properties, and several more locations as eligible for participation in their grant program to install public charging infrastructure. All of these locations can help enable access to EVs for those drivers without access to home charging.

3. **Innovative rate structures will encourage EV adoption.**

Forward-thinking tariff structures are needed to ensure fueling costs are competitive with internal combustion engine – or ICE – vehicles. Current commercial rate structures were not designed with electric vehicles' unique load profiles. Even though electricity costs are only a part of the puzzle -- around 30-40% of operating costs at the least, and sometimes up to 80% -- a high demand charge tariff often means the difference between a certain site being viable or non-viable for charging infrastructure. EVgo has been and continues to work with other thought leaders on responsible tariff reform that is beneficial for drivers, charging companies, and utilities alike. Notably, we would recommend that the ICC look to precedents being set and work underway in Washington, New York, and California on this critical piece of the EV puzzle.

4. **Building code considerations will enable more ubiquitous EV charging.**

Building codes and local zoning can often pose challenges for EVSE deployment but can also provide opportunities. For example, minimum parking spot requirements for retail centers can limit site development for an EV charger if installing a public EV charging space counts against a parking lot's minimum requirements. Instead, EVSE should be exempt, as parking is still able to take place while vehicles are charging. While this is only one example, the ICC should consider how local zoning codes can either support or impede building out this critical piece of infrastructure. Additionally, the ICC should consider how minimum standards can be crafted to avoid favoring one charging profile over another, such as by requiring minimum throughput rather than charger counts.

5. **Incentives drive both EV car sales and a more sustainable business model for EV charging.**

While EVgo and other companies have started to build public charging infrastructure to enable EV adoption in Illinois, the visibility of widespread charging infrastructure is needed to encourage more drivers to purchase EVs. The business case for charging infrastructure in Illinois will increase as vehicle sales grow and more EV drivers are on the road able to use the charging networks, spurring more investment from private charging companies. That is why EVgo is supportive of rebates either at the utility or legislative level that would provide purchase incentives to interested EV buyers and would point again to California as an example, where incentive amounts are tiered based on income level. Additionally, robust EV infrastructure legislation has been introduced in New Jersey this legislative session that provides EV charging goals for the state as well as car rebates for battery electric vehicles (BEVs).

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EVgo would like to reiterate our appreciation of the ICC's interest in exploring EV best practices and reducing barriers to EV and EVSE adoption. EVgo thanks the Commission for the opportunity to provide input on this docket, and please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Sincerely,

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